

# Exhibit A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JASON DOHERTY,

Plaintiff,

Docket No.  
18-cv-10898 (NSR)

- against -

PATRICIA BICE, individually and as Dean of Student Affairs for Purchase College, State University of New York; JARED STAMMER, individually and as Conduct Officer for Purchase College, State University of New York; and QUI QUI BALASCIO, individually and as Associate Dean for Student Affairs for Purchase College, State University of New York,

**RESPONSE TO DEFENDANTS'  
FIRST SET OF  
INTERROGATORIES TO  
PLAINTIFF**

Defendants.  
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Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Jason Doherty, by his attorney Ruskin Moscou Faltischek, P.C., hereby responds to Defendants' First Set of Interrogatories to Plaintiff (the "Interrogatories") as follows.

**GENERAL RESPONSES AND OBJECTIONS**

1. Plaintiff objects to the Interrogatories to the extent that they propose to impose obligations upon plaintiff in excess of those created by the Federal Rules of Civil Procedure and Local Rules of this Court.

2. Plaintiff objects to the Interrogatories to the extent that they seek information previously produced by plaintiff in connection with its Initial Disclosure in this action.

3. In providing these General Responses and Objections to the Interrogatories, plaintiff does not in any way waive, nor intend to waive, but rather intends to preserve and is preserving:

this objection, plaintiff has not retained an expert witness at this time. If and when an expert is retained, plaintiff will provide the disclosures required by the Federal Rules of Civil Procedure.

**Interrogatory No. 4**

*Identify any and all economic injuries which Plaintiffs claim to have sustained as a result of Defendants' acts as alleged in the Amended Complaint, including a detailed description of their nature, the date(s) incurred, witnesses to such injuries, documentary evidence of such injuries, and the monetary amount(s) claimed.*

**Response to Interrogatory No. 4**

Plaintiff objects to this Interrogatory as outside the scope of the limitation in Local Rule 7033-1.

Subject to this objection, plaintiff is not claiming economic injuries.

**Interrogatory No. 5**

*Identify any and all physical or emotional injuries Plaintiffs claim to have sustained as a result of Defendants' acts as alleged in the Amended Complaint, including detailed description of their nature, the date(s) incurred, witnesses to such injuries, documentary evidence of such injuries, and the monetary amount(s) claimed.*

**Response to Interrogatory No. 5**

Plaintiff objects to this Interrogatory as outside the scope of the limitation in Local Rule 7033-1.

Subject to this objection, plaintiff has suffered, and continues to suffer, emotional distress on an almost daily basis, including increased anxiety and inability to fully utilize campus facilities.

**Interrogatory No. 6**

*Identify any other injuries Plaintiffs claim to have sustained as a result of Defendants' acts as alleged in the Amended Complaint, including a detailed description of their nature, the date(s) incurred, witnesses to such injuries, documentary evidence of such injuries, and the monetary amount(s) claimed.*

**Response to Interrogatory No. 6**

Plaintiff objects to this Interrogatory as outside the scope of the limitation in Local Rule 7033-1.

Subject to this objection, plaintiff is not alleging any other injuries except as set forth in Response to Interrogatory No. 5.

**Response to Interrogatory No. 13**

Plaintiff objects to this Interrogatory as outside the scope of the limitation in Local Rule 7033-1.

**Interrogatory No. 14**


*Identify all persons Plaintiff claims allegedly discriminated against him on the basis of his disability.*

**Response to Interrogatory No. 14**

Plaintiff objects to this Interrogatory as outside the scope of the limitation in Local Rule 7033-1.

Dated: Uniondale, New York  
March 25, 2021

RUSKIN MOSCOU FALTISCHEK P.C.

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